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9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
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12 In Re 17 U.S.C. § 512(h) Subpoena to  
13 CLOUDFLARE, INC.

Case Number: 2:23-mc-00182

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15 **DECLARATION OF JAN VAN  
16 VOORN IN SUPPORT OF  
17 ISSUANCE OF SUBPOENA  
18 PURSUANT TO 17 U.S.C. § 512(h)**  
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21 I, Jan van Voorn, the undersigned, declare that:

22 1. I am Executive Vice President and Chief of Global Content Protection  
23 for the Motion Picture Association, Inc. (“MPA”). I submit this declaration on  
24 behalf of Disney Enterprises, Inc., Sony Pictures Animation, Inc., Universal City  
25 Studios Productions LLLP, and Warner Bros. Entertainment, Inc. (“ACE  
26 Members”), each of which is a member of the Alliance for Creativity and  
27 Entertainment (“ACE”). ACE is a global coalition of leading content creators and  
28 on-demand entertainment services committed to supporting the legal marketplace

1 for video content and addressing the challenge of online piracy. The ACE  
 2 Members, whether themselves or through subsidiaries and affiliates, own the  
 3 copyrights in the below referenced copyrighted works.

4       2. The ACE Members (via the Motion Picture Association, Inc.) are  
 5 requesting issuance of the attached proposed subpoena that would order Cloudflare,  
 6 Inc. to disclose the identities, including names, physical addresses, IP addresses,  
 7 telephone numbers, e-mail addresses, payment information, account updates and  
 8 account histories of the users operating the following websites:

No	Domain	Infringed Title 1	Infringing URL 1	Infringed Title 2	Infringing URL 2
1	filmize.tv	Fast & Furious 9	filmize.tv/filmes/velozes-furiosos-9/	Spider-man: Into the Spider-Verse	filmize.tv/filmes/home-m-aranha-no-aranhaverso/
2	hinatasoul.com	Tokyo Revengers S02E01	hinatasoul.com/videos/239742	Mob Psycho 100 S01E01	hinatasoul.com/videos/14954
3	anitube.vip	Tokyo Revengers S02E01	anitube.vip/video/239742	Mob Psycho 100 S01E01	anitube.vip/video/14954

17       3. The purpose for which this subpoena is sought is to obtain the identities  
 18 of the individuals assigned to these websites who have exploited ACE Members'  
 19 exclusive rights in their copyrighted motion pictures without their authorization.  
 20 This information will only be used for the purposes of protecting the rights granted  
 21 to ACE Members, the motion picture copyright owners, under Title II of the Digital  
 22 Millennium Copyright Act.

24       I declare under penalty of perjury under the laws of the United States of  
 25 America that the foregoing is true and correct to the best of my knowledge,  
 26 information or belief.

1 Executed at Redondo Beach, California, on December 21, 2023.  
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Jan van Voorn

